

Federal Defenders OF NEW YORK, INC.

D/F

Eastern District
16 Court Street - 3rd Floor, Brooklyn, NY 11241
Tel: (718) 330-1200 Fax: (718) 855-0760

Leonard F. Joy
Executive Director

Eastern District
Peter Kirchheimer
Attorney-in-Charge

October 31, 2005

The Honorable Allyn R. Ross
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Application granted
So ordered
11/1/05 JSDJ

Dear Judge Ross:

Re: United States v. Charita Paschal, 05-CR-729

Charita Paschal is charged with the importation of narcotics. She was released by Magistrate Judge Pollack on September 1, 2005, on a \$100,000 bond secured by her father's and her two sisters' signatures. The conditions of her release include confinement at home under electronic monitoring, limited travel, drug treatment assessment, and, significantly, that she reside with her father.

Because Mr. Paschal's home was too small, but the bond required that he live with his daughter, he moved in with Ms. Paschal. That living arrangement has not been ideal; and because Mr. Paschal is also currently taking care of Ms. Paschal's nephew he, too, has joined the household. Both Ms. Paschal and her father would like to be living alone. Mr. Paschal is paying rent for his own apartment and is unhappy having to live somewhere else. Ms. Paschal also does not like living in such close proximity with her father, especially since both are confined to a small apartment all day. Accordingly, we respectfully request Your Honor to permit Ms. Paschal to live alone, rather than with her father. It should be noted that her sister Cheryl, one of the suretors, has moved into the same apartment building complex as Ms. Paschal and family is therefore close at hand.

I have discussed this matter both with Laurie Highsmith, Ms. Paschal's pre-trial services officer, and AUSA Nicole Boeckmann. Neither opposes this request.

Thank you for your attention to this matter.

Respectfully submitted,


Florian Miedel

C/m